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*Attorneys for Zoho Corporation and
Zoho Corporation Pvt., Ltd.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ZOHO CORPORATION

Plaintiff,

v.

SENTIUS INTERNATIONAL, LLC

Defendant.

SENTIUS INTERNATIONAL, LLC

Counterclaimant,

v.

ZOHO CORPORATION and
ZOHO CORPORATION PVT. LTD.

Counter-Defendants.

Case No: 4:19-cv-00001-YGR

**STIPULATION AND ~~PROPOSED~~
ORDER OF DISMISSAL WITH
PREJUDICE**

1 WHEREAS, this action was commenced on January 1, 2019 by the filing of the Complaint;

2 WHEREAS, Plaintiff Zoho Corporation filed a First Amended Complaint on March 18, 2019
3 (Dkt. No. 14);

4 WHEREAS, in the First Amended Complaint, Zoho Corporation seeks a declaration that it
5 has not and does not infringe any valid or enforceable claim of U.S. Patent Nos. 7,672,985 (“’985
6 patent”) and RE43,633 (“’633 patent”) (collectively “the patents-in-suit”) and that Zoho has not
7 contributed to or induced, and is not contributing to or inducing or otherwise liable for any
8 infringement of the either of the patents-in-suit ;

9 WHEREAS, on May 15, 2019, Defendant Sentius International, LLC (“Sentius”) filed
10 counterclaims against both Zoho Corporation and Zoho Corporation Pvt. Ltd. (collectively, “Zoho”)
11 alleging that each Zoho entity infringed the patents-in-suit (Dkt. No. 29);

12 WHEREAS, on June 12, 2019, Zoho Corporation answered Sentius’ counterclaims, *inter*
13 *alia*, denying infringement and asserting as an affirmative defense that each of the patents-in-suit is
14 invalid (Dkt. No. 32);

15 WHEREAS, on August 26, 2019, Zoho Corporation Pvt., Ltd. answered Sentius’
16 counterclaims, *inter alia*, denying infringement and asserting as an affirmative defense that each of
17 the patents-in-suit is invalid (Dkt. No. 38);

18 WHEREAS, on October 15, 2020, this Court found the claims of the ’633 Patent invalid for
19 lack of written description under 35 U.S.C. § 112 (Dkt. No. 88);

20 WHEREAS, on May 4, 2022, the Patent Trial and Appeal Board determined that all
21 challenged claims of the ’985 Patent are invalid, including all claims asserted against Zoho in this
22 action;

23 WHEREAS, on December 11, 2023, the United States Court of Appeals for the Federal
24 Circuit affirmed the Patent Trial and Appeal Board’s determination that the claims of the ’985 Patent
25 are invalid;

26 WHEREAS, the parties stipulate to dismissal with prejudice of the entire action, with each
27 party to bear their costs and attorneys’ fees and that Plaintiff and Counter-defendant Zoho
28 Corporation and Counter-defendant Zoho Corporation Pvt. Ltd. retain the right to challenge validity,

1 infringement, and/or enforceability of the patents-in-suit, via defense or otherwise, in any future suit
2 or proceeding.

3
4 Dated: December 22, 2023

Respectfully submitted,

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6 MARTON RIBERA SCHUMANN &
CHANG LLP

7 By /s/ Phillip J. Haack
8 PHILLIP J. HAACK

9
10 Dated: December 22, 2023

Respectfully submitted,

11
12 CARR & FERRELL LLP

13 By /s/ Robert J. Yorio
14 ROBERT J. YORIO

15 SETH LAW OFFICES

16
17 By /s/ Sandeep Seth
18 SANDEEP SETH

19 Attorneys for Defendant and
20 Counterclaimant SENTIUS
INTERNATIONAL, LLC

~~PROPOSED~~ ORDER

NOW THEREFORE, upon consent of the parties hereto, it is HEREBY ORDERED:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), all claims in the above-captioned action are dismissed with prejudice. Counter-defendants Zoho Corporation and Zoho Corporation Pvt. Ltd. retain the right to challenge validity, infringement, and/or enforceability of the patents-in-suit via defense or otherwise, in any future suit or proceeding.

Each party shall bear its own costs, expenses, and attorneys' fees.

IT IS SO ORDERED.

Date: January 4, 2024


HONORABLE YVONNE GONZALEZ ROGERS
UNITED STATES DISTRICT COURT JUDGE